

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CUTBERTO VIRAMONTES, an individual and resident of Cook County, Illinois, <i>et al.</i> ,)	
)	Case No. 1:21-cv-04595
Plaintiffs,)	Judge: Rebecca R. Pallmeyer
)	
vs.)	Magistrate Judge: Susan E. Cox
)	
THE COUNTY OF COOK, a body politic and corporate, <i>et al.</i> ,)	
)	
Defendants.)	

DECLARATION OF SARAH FOLLMER

I, Sarah Follmer, declare as follows:

1. I am the Assistant Vice President of Operations for the Jewish United Fund of Metropolitan Chicago (“JUF”). I submit this declaration to place before the Court facts relevant to the Brief of *Amicus Curiae* Chicago Board of Rabbis in Support of Defendants’ Motion for Summary Judgment. I make this declaration based on my personal knowledge and belief.

2. Between August 2022 and September 2022, 80 diverse Jewish organizations in the metropolitan Chicago area, including 34 synagogues, responded to a JUF survey about security. In my role as Assistant Vice President of Operations, I recorded and tabulated the survey responses based on my professional judgment and discretion.

3. The responding synagogues reported having various security features in place, including, among others: cameras, doors that lock, security alarms, panic buttons, keycard or fob access, safety glass or window film, bollards, and video intercoms at entry.

4. Approximately 79% of responding synagogues reported having a security budget. The reported synagogue security budget estimates range from \$5,000 to \$200,000, with an average of \$74,122 per year and a median of \$35,000.

5. Approximately 21% of responding synagogues and approximately 12% of total survey respondents reported that they do not have a security budget.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 10, 2023

/s/ Sarah Follmer

Sarah Follmer